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Attorneys for Defendants
SONY COMPUTER ENTERTAINMENT AMERICA LLC AND
SONY NETWORK ENTERTAINMENT INTERNATIONAL LLC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

DANIEL RODRIGUEZ,

Plaintiff,

v.

SONY COMPUTER ENTERTAINMENT
AMERICA LLC, a Delaware limited liability
company, SONY NETWORK
ENTERTAINMENT INTERNATIONAL
LLC, a Delaware limited liability company,
and JOHN DOE DEFENDANTS 1-10

Defendants.

Case No. 11-CV-4084-PJH

**STIPULATION AND [~~PROPOSED~~] ORDER
EXTENDING TIME TO RESPOND TO FIRST
AMENDED CLASS ACTION COMPLAINT
(Civ. L.R. 6-1)**

Hon. Phyllis J. Hamilton

Pursuant to Civil Local Rule 6-1, defendants Sony Computer Entertainment America LLC
("SCEA") and Sony Network Entertainment International LLC ("SNEI") (collectively
"Defendants") and plaintiff Daniel Rodriguez ("Plaintiff") (collectively with Defendants, the
"Parties"), stipulate as follows:

1 WHEREAS, on August 18, 2011, Plaintiff filed a putative Class Action Complaint against
2 SCEA in the above-captioned matter (Dkt. No. 1);

3 WHEREAS, Plaintiff and SCEA stipulated to extend the deadline for SCEA to respond to
4 the Class Action Complaint to November 30, 2011 (Dkt. No. 20);

5 WHEREAS, SCEA filed its Motion to Dismiss or, in the alternative, to Strike on
6 November 30, 2011 (Dkt. No. 21);

7 WHEREAS, Plaintiff and SCEA stipulated to extend the deadline for Plaintiff to file his
8 Opposition to SCEA's Motion to Dismiss or, in the alternative, to Strike until December 21, 2011
9 (Dkt. No. 31);

10 WHEREAS, Plaintiff filed a Statement of Non-Opposition to SCEA's Motion to Dismiss
11 or, in the alternative, to Strike, on December 21, 2011 (Dkt. No. 32);

12 WHEREAS, Plaintiff filed his First Amended Class Action Complaint on December 21,
13 2011 (Dkt. No. 33);

14 WHEREAS, the First Amended Class Action Complaint adds SNEI as a new defendant,
15 makes new allegations against SCEA, and consists of 15 pages and 75 numbered paragraphs;

16 WHEREAS, in light of Defendants' and counsels' limited availability over the holidays,
17 the addition of a new defendant, and the inclusion of new allegations against SCEA, Defendants
18 have requested additional time to respond to the First Amended Class Action Complaint than the
19 time frame otherwise applicable under the Federal Rules of Civil Procedure;

20 WHEREAS this is the Parties' first stipulation extending the time to respond to the First
21 Amended Class Action Complaint;

22 WHEREAS, extending the deadline for Defendants to file their responses to the First
23 Amended Class Action Complaint as set forth below will not alter the date of any event or
24 deadline already fixed by Court order;

25 WHEREAS, Plaintiff has agreed to extend the time for each of the Defendants to respond
26 to the First Amended Class Action Complaint;

27 NOW THEREFORE, the Parties stipulate as follows:

28 Defendants shall each have up to and including February 3, 2012, to answer or otherwise

1 respond to the First Amended Class Action Complaint.

2 **IT IS SO STIPULATED.**

3
4 Dated: December 28, 2011

COOLEY LLP

MICHAEL G. RHODES (116127)

MICHELLE C. DOOLIN (179445)

RAY A. SARDO (245421)

NICHOLAS J. ECHEVESTRE (273747)

7 /s/ Ray A. Sardo

8 RAY A. SARDO (245421)

9 Attorney for Defendants

10 SONY COMPUTER ENTERTAINMENT AMERICA LLC; and

11 SONY NETWORK ENTERTAINMENT INTERNATIONAL
LLC

12 Dated: December 28, 2011

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SEAN P. REIS (184044)

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ARI J. SCHARG (*PRO HAC VICE*)

14 RAFEY S. BALABANIAN (*PRO HAC VICE*)

15 WILLIAM C. GRAY (*PRO HAC VICE*)

16 /s/ Sean P. Reis

Sean P. Reis (184044)

17 Attorneys for Plaintiff

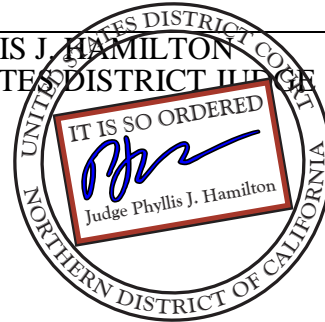
18 DANIEL RODRIGUEZ

1 **PURSUANT TO STIPULATION IT IS SO ORDERED.**

2 January 3, 2012

3 DATED: ~~December~~ _____, 2011

4 HON. PHYLLIS J. HAMILTON
5 UNITED STATES DISTRICT JUDGE



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ATTESTATION PURSUANT TO GENERAL ORDER 45

I, Ray A. Sardo, attest that concurrence in the filing of this STIPULATION AND [PROPOSED] ORDER EXTENDING TIME TO ANSWER FIRST AMENDED COMPLAINT has been obtained from each of the other signatories. I declare under penalty of perjury that the foregoing is true and correct. Executed this 28th day of December, 2011, at San Francisco, California.

/S/ Ray A. Sardo
Ray A. Sardo